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Attorneys for Defendant

GOOGLE LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, et al. individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

GOOGLE LLC, *et al.*,

Defendant.

Case No. 3:20-CV-04688-RS

**DECLARATION OF EDUARDO E.
SANTACANA IN SUPPORT OF
GOOGLE LLC'S RESPONSE TO
PLAINTIFFS' RENEWED AND
AMENDED MOTION TO DIRECT
NOTICE TO MEMBERS OF THE
CERTIFIED CLASSES
[DKT. 395]**

Date: June 13, 2024

Time: 1:30 p.m.

Ctrm: 3 - 17th Floor

Judge: Hon. Richard Seeborg

Action filed: July 14, 2020

Trial Date: February 10, 2025

1 I, EDUARDO E. SANTACANA, declare:

2 1. I am an attorney licensed to practice law in the State of California and am a partner
3 with the law firm of Willkie Farr & Gallagher LLP, located at 333 Bush Street, 34th Floor,
4 San Francisco, California 94104, counsel for Defendant Google LLC (“Google”) in the above-
5 captioned action. Unless otherwise stated, the facts I set forth in this declaration are based on my
6 personal knowledge or knowledge I obtained through my review of corporate records or other
7 investigation. If called to testify as a witness, I could and would testify competently to such facts
8 under oath.

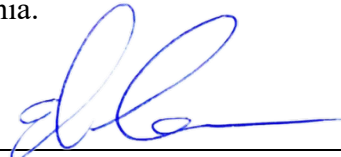
9 2. I submit this declaration in support of Google’s Response to Plaintiffs’ Renewed and
10 Amended Motion to Direct Notice to Members of the Certified Classes.

11 3. Attached hereto as **Exhibit A** is an email notice to Google Workspace Administrators.

12 4. Attached hereto as **Exhibit B** is an email notice to the parents/guardians supervising
13 Google Accounts for users under age 13.

14 I declare under penalty of perjury under the laws of the United States of America that the
15 foregoing is true and correct.

16 Executed May 10, 2024, at San Francisco, California.

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19 Eduardo E. Santacana
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